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7 Attorney for: AmeriCredit Financial Services, Inc., dba GM  
8 Financial

9  
10 UNITED STATES BANKRUPTCY COURT  
11 DISTRICT OF NEW JERSEY  
12

13 In re: )  
14 ) Case No. 18-27035(JNP)  
15 )  
16 GREGORY TOBIAS ) Chapter 13  
17 ROSALIND RUSS-TOBIAS )  
18 ) Hearing Date: 11-7-18  
19 )  
20 ) **OBJECTION TO CONFIRMATION**  
21 )

22 AmeriCredit Financial Services, Inc., dba GM Financial ("GM  
23 FINANCIAL"), a secured creditor of the debtors, objects to  
24 the confirmation of the debtors' plan for the following  
25 reasons:

26 a. **Plan Silent and should be amended to provide for payment**  
27 **of pre-petition arrears:** GM FINANCIAL has a first  
28 purchase money security interest encumbering 2014 Toyota  
29 Corolla owned by the debtor. At filing the loan  
encumbering the vehicle was one month in arrears pre-  
petition in the amount of \$314.20. Part 4b of the plan  
should be amended to provide for payment of pre-petition  
arrears of \$314.20 to GM Financial with current payments  
to be paid directly, outside the plan to GM Financial.

- 1       b. **Proof of insurance:** The vehicle must be insured with  
2       comprehensive and collision insurance coverage and  
3       liability coverage in accordance with the requirements  
4       contained in the contract. GM FINANCIAL Dealer Services  
5       must be listed as loss payee or additional insured. **The**  
6       **debtor must provide GM FINANCIAL with proof that the**  
7       **vehicle is insured in accordance with §1326(a)(4) and**  
8       **this portion of the objection to confirmation should be**  
9       **considered a demand that the debtor provide proof of**  
10       **insurance.**  
11  
12  
13       c. GM FINANCIAL must retain its lien on the vehicle after  
14       confirmation and the plan must provide for this.  
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16                               /s/ John R. Morton, Jr.\_\_\_\_  
17                               John R. Morton, Jr., attorney for  
18                               GM FINANCIAL

19       Dated: 9-27-18  
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